

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

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INTEGRATED HEALTH SERVICES OF )	
CLIFF MANOR, INC., INTEGRATED )	
HEALTH SERVICES AT RIVERBEND, )	
INTEGRATED HEALTH SERVICES AT )	
SOMERSET VALLEY, INC., ALPINE )	
MANOR, INC., BRIARCLIFF NURSING )	
HOME, INC., INTEGRATED HEALTH )	
GROUP, INC., SPRING CREEK OF IHS, INC., )	
FIRELANDS OF IHS, INC., ELM CREEK OF )	Civil Action No. 04-910 (GMS)
IHS, INC., and IHS LONG TERM CARE )	
SERVICES, INC., )	
Plaintiffs, )	
v. )	
THCI COMPANY LLC, )	
Defendant, )	
v. )	
ABE BRIARWOOD CORPORATION and )	
JOHN DOES 1-10, )	
Additional Counterclaim )	
Defendants. )	

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**MOTION BY DEFENDANT THCI COMPANY LLC FOR PARTIAL SUMMARY  
JUDGMENT PURSUANT TO FED. R. CIV. P. 56 AND PERMANENT INJUNCTION**

Defendant THCI Company LLC (“THCI”), by and through its undersigned counsel, moves pursuant to Fed. R. Civ. P. 56 (the “Motion”), for an Order granting partial summary judgment and evicting Integrated Health Services of Cliff Manor, Inc., Integrated Health Services at Riverbend, Inc., Integrated Health Services at Somerset Valley, Inc., Alpine Manor, Inc., Briarcliff Nursing Home, Inc., Integrated Health Group, Inc., Spring Creek of IHS, Inc., Firelands of IHS, Inc., and Elm Creek of IHS, Inc. (collectively, the “Nine Subsidiaries”)

and requiring them to vacate and surrender to THCI the nine nursing home facilities currently occupied by the Nine Subsidiaries. In support of the Motion, THCI relies upon THCI's Memorandum of Law in Support of Partial Summary Judgment and the Declaration of Warren Cole dated April 3, 2006.

Dated: April 3, 2006

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